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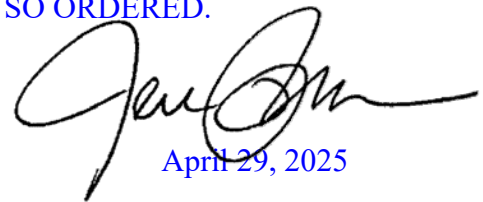
April 28, 2025

Application GRANTED. The Clerk is
directed to terminate ECF No. 59.

Via ECF

SO ORDERED.

Hon. Jesse M. Furman
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007



April 29, 2025

Re: UMB Bank, N.A. v. Bristol Myers Squibb Company, No. 24-cv-08668-JMF

Dear Judge Furman,

We write on behalf of Plaintiff UMB Bank, N.A. (“UMB”), solely in its capacity as Trustee under the Contingent Value Rights Agreement. UMB respectfully requests leave to file under seal an unredacted copy of its memorandum of law in opposition to Bristol-Myers Squibb Company’s motion to dismiss (the “Opposition”) and Exhibit 1 to the declaration of Maria Ginzburg in support thereof. UMB respectfully submits that these documents should be sealed for the same reasons stated in UMB’s Memorandum of Law in Support of Motion to File Exhibits Under Seal, ECF 6, which motion the Court granted on November 22, 2024, ECF 21 (the “Sealing Order”).

Like the documents covered by the Sealing Order, the Opposition and Exhibit 1 contain identifying and financial information for CVR holders that should remain confidential. In accordance with Section 7(C)(iii) of the Court’s Individual Rules and Practices in Civil Cases, UMB files (a) redacted copies of the Opposition and Exhibit 1 in public view and (b) unredacted copies of the Opposition and Exhibit 1 under seal showing UMB’s proposed redactions highlighted in yellow. UMB’s proposed redactions are narrowly tailored to protect only this sensitive, third-party confidential information.

Defendants Bristol-Myers Squibb Company and Equiniti Trust Company, LLC consent to the relief requested herein.

April 28, 2025

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Ginzburg', with a stylized flourish at the end.

Maria Ginzburg
Partner